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October 1, 2007

**VIA HAND DELIVERY and CM/ECF**

The Honorable Sue L. Robinson  
Lock Box 31  
United States District Court  
District of Delaware  
844 King Street  
Wilmington, DE 19801

**RE: Issuance of a letter to prepare a Rule 16 scheduling order**  
**Quill v. Catholic Diocese of Wilmington, et al., C.A. No. 07-435 (SLR)**

Dear Judge Robinson:

There are three sets of defendants in this case which was brought in diversity under the new Child Victim's Act of 2007: The Catholic Diocese and its Bishop, St. Elizabeth's Church and Rev. Francis DeLuca.

Anthony Flynn has filed an Answer for the Diocese and Bishop. Mark Reardon has answered for the Church. Steve Casarino represents defendant DeLuca but has received more time to Answer due to the unavailability of his client who is serving a 60 day term of imprisonment in New York. An Answer will be filed after defendant DeLuca is released.

By stipulation Mr. Flynn and I also are separately briefing a diversity issue. But as D.I. 18 indicates, the parties agreed that "discovery can, and should proceed during" the pendency of the motion.

Since these Answers to the Complaint have been filed by the main defendants, I respectfully request that the Court issue a letter directing the parties to draft a discovery plan and report back to the Court. I also will include Mr. Casarino in the process.

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Respectfully yours,

/s/ Thomas S. Neuberger

Attorney for Plaintiff

cc: Anthony G. Flynn, Esquire (via File & Serve)  
Mark L. Reardon, Esquire (via File & Serve)  
Stephen P. Casarino, Esquire (via US Mail)  
Thomas C. Crumplar, Esquire (via File & Serve)  
Robert Quill (via E-Mail)